

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

United States Courts  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

AUG 03 2021

for the

Southern District of Texas



Nathan Ochsner, Clerk of Court

\_\_\_\_ Galveston \_\_\_\_ Division

Kamal Bey, Takijah Bey

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

*Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

Gregg Abbott, WARREN KENNETH PAXTON JR.,  
JOHN CRAIG ESTLINBAUM, JAIME MASTERS,  
NATE MCDONALD, STEVEN ELLIOT ' STEVE '  
REIS, ROBERT LISTER, see attached*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)***COMPLAINT AND REQUEST FOR INJUNCTION****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Kamal Bey, Takijah Bey
Street Address	Moors BLVD C/O 1416 Cottonwood Avenue
City and County	Bay City Matagorda County
State and Zip Code	Texas 77414
Telephone Number	(979)877-1341
E-mail Address	grandsheikhkamalbey@temple1ancientmoorsofthenorthgate.org

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

## Defendant No. 1

Name	GREGG ABBOTT
Job or Title <i>(if known)</i>	Governor
Street Address	1100 San Jacinto
City and County	Austin, Travis County
State and Zip Code	Texas 78701
Telephone Number	(512) 463-2000
E-mail Address <i>(if known)</i>	

## Defendant No. 2

Name	Warren Kenneth Paxton Jr.
Job or Title <i>(if known)</i>	Attorney General
Street Address	300 W. 15th Street
City and County	Austin, Travis County
State and Zip Code	Texas 78701
Telephone Number	512-463-2100
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	John Craig Estlinbaum
Job or Title <i>(if known)</i>	Judge / Administrator
Street Address	1700 7th St. Rm. 305
City and County	Bay City, Matagorda
State and Zip Code	Texas 77414
Telephone Number	(409) 244-7625
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	Jamie Masters
Job or Title <i>(if known)</i>	Commissioner DFPS
Street Address	701 W. 51st street
City and County	Austin Travis County
State and Zip Code	Texas 78751
Telephone Number	(512) 438-4800
E-mail Address <i>(if known)</i>	



## **Temple #1 Ancient Moors Karankawa of the North Gate**

### **Continued list of Defendants:**

FRANK D "SKIPPER" OSBORNE, DENIS M. FORTENBERRY, Sharon Osborne, Crystal Spring, Ashley Green, Loretta Yeverino, Julia Bell, Theresa Dean, Whitney Thompson, Anna McCalla, Suzan Thompson, Keith Hatton, Amy Tapia, James Dancer owner Coastal Automotive, MATAGORDA COUNTY SPECIAL DISTRICTS SELF-INSURANCE POOL, MATAGORDA COUNTY, and BAY CITY TOWNSHIP CORPORATION.

### **. The Parties to This Complaint:**

#### **A. Plaintiff:**

Name Takijah Bey  
Street Address: Moors BLVD C/O 1416 Cottonwood Avenue  
City and County: Bay City, Matagorda County  
Telephone Number: (979)557-3892  
E-mail Address: [takijahdagodqueen@gmail.com](mailto:takijahdagodqueen@gmail.com)

#### **B. The Defendants continued:**

##### **Defendant No. 5**

Name: FRANK D "SKIPPER" OSBORNE  
Job or Title: Sheriff  
Street Address: 2308 Avenue F  
City and County: Bay City, Matagorda County  
Telephone Number: 979-245-5526  
E-mail Address:

##### **Defendant No. 6**

Name: DENIS M. FORTENBERRY  
Job or Title: Administrator  
Street Address: 1700 7<sup>th</sup> Street Room 305  
City and County: Bay City, Matagorda County  
Telephone Number: 979-244-7635  
E-mail Address:



## **Temple #1 Ancient Moors Karankawa of the North Gate**

Defendant No. 7

Name: Sharon Osborne

Job or Title: DFPS Agent

Street Address: 1700 Merlin Street

City and County: Bay City, Matagorda County

Telephone Number:

E-mail Address:

Defendant No. 8

Name: Crystal Spring

Job or Title: DFPS Agent

Street Address: 1700 Merlin Street

City and County: Bay City, Matagorda County

Telephone Number:

E-mail Address:

Defendant No. 9

Name: Anna McCalla

Job or Title: DFPS Agent

Street Address: 1700 Merlin Street

City and County: Bay City, Matagorda County

Telephone Number:

E-mail Address:

Defendant No. 10

Name: Loretta Yeverino

Job or Title: DFPS Agent

Street Address: 1700 Merlin Street

City and County: Bay City, Matagorda County

Telephone Number:

E-mail Address:



## **Temple #1 Ancient Moors Karankawa of the North Gate**

**Defendant No. 11**

**Name: Ashley Green**

**Job or Title: Attorney**

**Street Address: 6300 West Loop South, Suite 610**

**City and County: Bellaire Harris County**

**Telephone Number:**

**E-mail Address:**

**Defendant No. 12**

**Name: Theresa Dean**

**Job or Title: Attorney**

**Street Address: 2224 Avenue F**

**City and County: Bay City, Matagorda County**

**Telephone Number:**

**E-mail Address:**

**Defendant No. 13**

**Name: Julia Bella**

**Job or Title: Attorney**

**Street Address: 812 Barrett Street**

**City and County: Richmond Fort Bend County**

**Telephone Number:**

**E-mail Address:**

**Defendant No. 14**

**Name: Whitney Thompson**

**Job or Title: Attorney**

**Street Address: 1400 8<sup>th</sup> Street Suite 5B**

**City and County: Bay City, Matagorda County**

**Telephone Number:**

**E-mail Address:**



## **Temple #1 Ancient Moors Karankawa of the North Gate**

**Defendant No. 15**

**Name:** Suzan Thompson

**Job or Title:** Magistrate

**Street Address:** 1824 South Street

**City and County:** Bay City, Matagorda County

**Telephone Number:**

**E-mail Address:**

**Defendant No. 16**

**Name:** Amy Tapia

**Job or Title:** Justice of the Peace

**Street Address:** 405 Commerce

**City and County:** Palacios, Matagorda County

**Telephone Number:**

**E-mail Address:**

**Defendant No. 17**

**Name:** James Dancer

**Job or Title:** Owner Coastal Automotive

**Street Address:** 2006 Cottonwood Avenue

**City and County:** Bay City, Matagorda County

**Telephone Number:**

**E-mail Address:**

**Defendant No. 18**

**Name:** Keith Hatton

**Job or Title:** Agent Bay City Police Department

**Street Address:** 2201 Avenue H

**City and County:** Bay City, Matagorda County

**Telephone Number:** (979) 245-8500

**E-mail Address:**

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.  
8 stat 100, 8 stat 484, Treaty of Peace and Friendship 1787, Supremacy Clause

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Kamal Bey, is a citizen of the  
State of *(name)* Morocco, Delawares

**b. If the plaintiff is a corporation**

The plaintiff, *(name)*, is incorporated  
under the laws of the State of *(name)*,  
and has its principal place of business in the State of *(name)*

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* Gregg Abbott, is a citizen of  
the State of *(name)* Texas. Or is a citizen of  
*(foreign nation)*

## b. If the defendant is a corporation

The defendant, (name) STATE OF TEXAS, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) TEXAS.  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The remedy demanded and authorized for the basic crime of genocide is 18 USC 1091 (b)(2) a fine of not more than \$1,000,000 or imprisonment for not more than twenty years, or both, in any other case. (c) Incitement. Whoever directly and publicly incites another to violate subsection (a) shall be fined not more than \$500,000 or imprisoned not more than five years, or both. For each individual offense. At

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

## A. Where did the events giving rise to your claim(s) occur?

At my home 4309 Hiram Brandon Rd Bay City Texas, where i carry on my duties as Grand Sheikh and a Consular Officer.

## B. What date and approximate time did the events giving rise to your claim(s) occur?

April 17th 2018 sometime afternoon.

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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*  
My children were kidnapped/abducted, because Sharon Osborne filed a false complaint with the help of Denis Fortenberry and Officers of the Bay City Police Department, which caused Craig Estlinbaum to go out of his judicial authority and issue an emergency removal order to abduct my children, when the children that they took weren't even the child at the center of the incident, per the Bay City Police report I allowed the child in question my daughter to stay at her grandfathers house until she cooled off, because I had reported her as a runaway. These actions violate the most sacred fundamental right the upbringing of our off spring.
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#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

If you ever had your children taken away from you, see them crying, yelling and screaming, and you're powerless to do anything, you would know why monetary damages could never replace the precious time we've missed, first words or steps of your 5 month old new born, the phsycological scars of your children that will never heal. These are things that all the money in the world could never replace or bring back or make whole again. Add to the fact that the abuses continue to this day, and you would know why we seek Justice above all other things.

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#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. The immediate return, of all minor children, property, monies, consular documents, and premises.
  2. Payment of Allodial Time Schedule, Filing fees, Jurist fees and all other expenses associated with preparing a defense.
  3. Recognize the land/water/mineral Rights and Tribal boundaries of my people.
  4. Recognize our Courts Jurisdiction, Tribal and Consular Courts
  5. Recognize the Sovereignty of our Nation, that we are separate and distinct, Independent and freely exercise our Right to Autonomy and self-government without colonial influence in our free national or local elections.
  6. Access and control over our Natural Resources.
  7. The remedy demanded and authorized for the basic crime of genocide is 18 USC 1091 (b)(2) a fine of not more than \$1,000,000 or imprisonment for not more than twenty years, or both, in any other case. (c) Incitement. Whoever directly and publicly incites another to violate subsection (a) shall be fined not more than \$500,000 or imprisoned not more than five years, or both. For each individual offense.
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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 06/08/2021

Signature of Plaintiff

Printed Name of Plaintiff

Kamal El "Unnahop Ashonk" Ahmed Bey

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address